

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

In re: **SUE MIFKA STOTTS,**
Debtor

Chapter 13
Case No. 16-61788

CHARLES KABBASH
Plaintiff,

v. Adversary Proceeding No. 17-06002

SUE MIFKA STOTTS *et al*,
Defendants.

DONALD G. STOTTS
Plaintiff,

v. Adversary Proceeding No. 17-06005

SUE MIFKA STOTTS *et al*,
Defendants.

MOTION TO CONSOLIDATE

Comes now Charles Kabbash, by counsel, and respectfully moves the Court to consolidate the above cases for trial, now scheduled in Adversary Proceeding No. 17-06002 for **April 12, 2017 at 10 o'clock A.M.** in the courtroom of this Court in Charlottesville, Virginia for the following reasons:

1. That both cases involve the same Debtor and the same judgment creditors.
2. That the issues are the same, that is, the value of Debtor's interest in property known as 14043 Jefferson Highway in Louisa County, Virginia, what legal interest the Debtor

has in the property, and the amount and priority of the various judgment liens against the property.

3. That all counsel and the Trustee have now agreed to the consolidation, Debtor's counsel having indicated his consent on March 21, 2017.

4. That the pretrial conference is scheduled for **April 6, 2017 at 2 o'clock P.M.**, by telephone.

RESPECTFULLY SUBMITTED,

/s/ Ralph E. Main, Jr.

Counsel for Charles Kabbash

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Certificate

I hereby certify that the foregoing motion was transmitted electronically on March 21, 2017 to the following:

Herbert L. Beskin, Trustee
Steven Shareff, Esquire
Richard L. Greenberg, Esquire
Neal L. Walters, Esquire

/s/ Ralph E. Main, Jr.